

Commonwealth of Massachusetts Board of Library Commissioners

648 Beacon Street • Boston, Massachusetts 02215

April 12, 1996

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

RECEIVED

APR 16 1996

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

The following comments are being submitted in response to the FCC NPRM on Universal Service (CC Docket No. 96-45) by Robert C. Maier, Head of Library Development and Paul J. Kissman, Library Information Systems Specialist, Massachusetts Board of Library Commissioners.

Introduction

The Board of Library Commissioners Strategic Plan includes the following section in its vision statement:

"All Massachusetts libraries -- academic, public, school, institutional and corporate -- are linked electronically through a statewide computer and telecommunications network. This network carries text, images and other media and is accessible from home or office. Through this network users can search and retrieve information from Massachusetts libraries, community resource files, local, state and federal government resources, national and international sources, and licensed commercial databases."

Implementation planning for the Massachusetts Library and Information Network is well under way, and a \$4,00,000 annual budget has been proposed to our state legislature to cover initial annual costs that include maintenance of a virtual catalog, telecommunication costs and access to commercial databases to be offered to all 3,000 libraries in Massachusetts.

For public libraries, our existing 10 automated resource sharing networks are the key to Internet access. These networks already link 300 of our 370 public libraries and provide circulation control, Online Public Access Catalog functions, some databases and Internet access (though presently in a character-mode only).

1) Networks provide Internet access for all libraries. At present, member libraries are connected at a maximum of 56Kbps. This bandwidth is becoming inadequate as Web access and graphic user interfaces are deployed. The networks themselves are connected to the Internet using 56Kbps lines. These need to be upgraded.

2) Our network catalogs will become accessible via the Web as well as via telnet. Networks may also

024



host member library home pages. Under our vision, multimedia applications would be hosted.

3) Several of our networks host community information files.

The following comments address these needs:

Section III. Support for Rural, Insular, and High cost Areas and Low-Income Consumers

Core services for libraries in rural, insular, and high cost areas should include all 5 services: voice grade access to the public switched network with the ability to call and receive, touch-tone, single party service, access to 911 type service, and access to operator services.

ss. B.1.18 - Some rural libraries in Massachusetts do not have the wherewithal to support even one telephone line. The telephone is a primary reference tool for any library. Smaller libraries rely on subregional and regional support services in Massachusetts. Voice-grade telephone service is a requirement for this support network.

ss. B. 19 - As the NPRM points out, touch tone service is an increasingly common way for remote telephone users to interact with automated information systems. Therefore, touch-tone service should be a core service under universal service.

ss B. 20 - Single-Party Service will be essential to libraries for connectivity to databases valuable to library patrons via modem and to maintain the confidentiality of library patron records (Massachusetts General Law Ch. 4, s.7 cl. 26.). Because libraries are public gathering places, where there are often many small children, it is essential that emergency services can be reached quickly, which requires single-party service.

ss. B.21 - Emergency Services - (see ss B.20 above)

ss. B22 - Operator Services - Both for emergency services, and for the ability to use the telephone as an essential reference tool, access to an operator is required, and should be considered a core service. There should be no surcharge for libraries for using operator assistance or for directory assistance.

ss. B 25-30 Libraries should receive discounted rates on core services, and libraries in rural or insular areas should receive rates that allow them access to similar resources (e.g., Internet Service Providers) at rates comparable to or lower than urban libraries, since it is more likely that those services are not available within the local calling area.

We do not have any specific recommendations as to how these discounts should be achieved, but we submit that the services could be subsidized out profits (fund pools) derived from regular business and residential lines service, interexchange services to regular business and residential customers, and advanced services to regular business and residential customers.

ss. D 66 - Due to the extremely rapid rate of change in telecommunications technology, and because libraries play such a central role in the delivery of electronic/online information to

the general public (for education and for the general good), core services should be reviewed at least every 5 years. Advanced services to libraries (Section V. below) should be reviewed at least every 3 years.

Section IV: Schools, Libraries and Health Care Providers

ss. B1. 77. As described above in Section III, we feel that all universal core services made available generally, should also be made available to libraries.

ss. B1. 78-80. Stemming from their central role as information providers for the whole community, and as sole information providers for many, libraries should have at a minimum, affordable access to online electronic information. This includes, but should not be limited to: access to the Internet. Other Wide Area Network information resources may be essential to libraries' missions, as provided by municipal, county, regional, or statewide networks.

In Massachusetts, libraries are affiliated with various entities that may affect the definition of "geographic area". County boundaries may affect municipal government, but have little bearing on library operations. The primary geopolitical boundaries are based on regional service networks (of which there are 3, Western, Central, and Eastern Massachusetts) and ten automated resource sharing networks (shared electronic databases, public access, and circulation systems) that span the state. Several of these networks span multiple area codes. If the final definition of a geographic area cannot be made broad enough to include the whole of these entities, then there should be a mechanism by which a centralized purchasing authority in one geographical region (e.g., a library network's administrative office), can do business with a neighboring geographical region's telecommunications provider and obtain the similar discounted prices for the same services.

ss. B1 81. There is a need for up-to-date advanced services in libraries for the many individuals who cannot afford those services themselves. Since we cannot peer very far into the future, this means that frequent reviews must take place to determine what constitutes an essential advanced service. Even three years ago, many librarians might not have recognized the pivotal role that the Internet would play in libraries. Certainly, they would not have anticipated the bandwidth requirements for graphical and multimedia presentation of Internet resources. Information services in libraries should be leading-edge, and certainly not trail behind services available to the average home.

ss B2a. 83. Discounts should be applied to installation of lines and equipment as well as maintenance of the lines. Whenever possible, flat-rates should be available. For instance, only in the last few months has a flat-rate ISDN service become available (as a six-month test) for schools, libraries, and non-profits in Massachusetts. Libraries, who exist on extremely tight budgets, must be able to anticipate the telecommunications costs involved in online information delivery. There should be a maximum amount of flexibility in sizing the data links to libraries. For instance one library may operate efficiently with a 56kpbs data line. Another may require 3-channels of a fractional T-1, and yet another may require a full T-1 connection. Right now, these options do not exist. It would benefit both telecommunications carriers and libraries if these lines were sized appropriately. The telecommunications carrier would not need to commit anymore trunk bandwidth than necessary, and the library would receive adequate service at no more than necessary prices.

ss B2b. 85 Because of the way Massachusetts has structured its automated library networks, we strongly recommend that non-profit organizations, such as library networks, should be able to order and pay for core and advanced services on behalf of their member libraries. It would be a bureaucratic nightmare if each library member of an automated network had to order and pay for these lines individually. Telecommunications offsets distributed through the Massachusetts Board of Library Commissioners (from state funds) would also be much more difficult.

ss.B2b 87. The definition for eligible libraries poses some problems. The Library Services and Construction Act has not been reauthorized, and will probably be replaced by the Library Services and Technology Act, or LSTA (administered under a new "Institute of Museums and Libraries") This means that the Long Range Program for each state library agency will need to be rewritten to come into compliance with the LSTA. Therefore, a more general definition of funds for technology projects may need to be developed. If you cannot alter this eligibility requirement without amending the law itself, some sort of "equivalency" from LSCA to LSTA will have to be worked into your regulations.

Currently, the Massachusetts Title III eligibility is only for resource sharing groups. Individual libraries would have applied for funds under Title I of LSCA. Perhaps eligibility should be restricted to libraries that are eligible for funding under LSCA Titles I,II, or III.

Section V: Enhancing Access to Advance Services for Schools, Libraries, and Health Care Providers

ssB 109. High-speed digital access at discounted rates should be available to members of cooperative library networks. These discounts should not be restricted to one kind of telephone service. Rather, Frame Relay, ISDN, DDS, and Fractional T-1 at various bandwidths should be discounted for libraries. For some very small libraries, dedicated analog circuits might be more appropriate. These should also be discounted. Newer technologies such as high-speed ATM, and SONET should also be discounted. There should be discounts on bandwidths sufficient to support technologies such as videoconferencing. Internet connectivity should be discounted. Wide area network connectivity between libraries and schools should be discounted.

As mentioned above, in Massachusetts we need a mechanism by which library networks that span two "geographical" areas can receive discounted services for all their members. Discounts should also be offered for high-bandwidth data lines that cross LATA's. If library networks tie into high-speed statewide backbone networks, the portion of the service that is used by libraries should also be discounted.

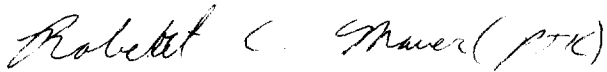
Certainly, the advanced services should be a broader of services than the core services in Section IV.

Conclusion

Generally, telecommunications services to libraries that provide educational support and access to information resources for all residents should be discounted. Telecommunications providers who offer

connections to information resources, specifically the Internet, should offer discounted rates. Higher speed connectivity should be governed by the advanced services regulations (NPRM Section V). Basic telephone and Internet connectivity should be regulated under universal service core services (Section IV).

With the "competitively neutral" mechanisms in place, either offsets to providers, or reimbursements, libraries should be able to receive advanced services at affordable rates. This may mean that services be delivered at cost, or even slightly below cost, by the telecommunications providers.

A handwritten signature in cursive script, reading "Robert C. Maier (PTC)".

Robert C. Maier

A handwritten signature in cursive script, reading "Paul J. Kissman".

Paul J. Kissman